

DEC - 1 2005

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For The Northern Mariana Islands
By _____
(Deputy Clerk)

**UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

TOSHIHIRO TAKAHASHI,

Plaintiff,

vs.

MAEDA PACIFIC CORPORATION,

Defendant.

CIVIL ACTION NO. CV 05-0026

**PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT MAEDA PACIFIC
CORPORATION**

TO: John D. Osborn, Attorney for Defendant Maeda Pacific Corporation,

Please take notice that pursuant to Federal Rules of Civil Procedure 34,
Plaintiff Toshihiro Takahashi, through his attorney, Victorino DLG. Torres requests that
Defendant produce for inspection, examination, and copying all of the documents or items listed
herein which are in its possession, custody, or control, at the Torres Brothers & Flores, LLC.
Attorneys At Law, Bank of Guam Building 3rd floor, Garapan, Saipan, or other agreed method,
within 30 days after service of this request.

(Plaintiff's First Request For Production of Documents to Maeda Pacific Corporation)

ORIGINAL

DEFINITIONS

- 1
2 1. "You" or "your" means and includes the person responding to this request for production
3 and all other persons or entities acting or purporting to act on her behalf, including,
4 without limitation, its present and former attorney(s), investigator(s), insurance carrier(s)
5 and/or agent(s) accountant(s) and their agents, employees, and consultants; her present
6 and former offices, directors and/or partners; its present and former affiliates,
7 subsidiaries, controlled companies, parent and/or other similar entities.
- 8 2. "Person" includes, without limitation, any natural person, firm, partnership, association,
9 joint ventures, sole proprietorship, organization, business trust, corporation, or any other
10 group combination acting as a unit or other form of legal, business, non-profit, or
11 governmental entity.
- 12 3. "Subject Lawsuit" means this lawsuit known and numbered as appears on the cover of
13 this document.
- 14 4. "Documents" "records" and "writing" mean and include the original and any copy,
15 regardless of origin or location, of any printed, typed, written, graphic or recorded
16 materials or tangible things of every kind, however produced or reproduced, in its
17 possession, custody or control, and includes but is not limited to, any letters,
18 correspondence, memoranda, telegrams, telexes, other communications, agreements,
19 contracts, offers, proposals, prospectuses, ballot tariffs, promissory notes, deeds, leases,
20 agreements of sales, mortgages, financial statement, balance sheets, profit and lose
21 statements, tax returns, loan applications, work papers, ledgers, journals books of
22 accounts, cancel checks, deposit receipts, statement, bills, air bills, consignment note,
23 purchase orders, invoice, summaries, outlines, estimates, budgets, projections, cost
24 analyses, damage calculations, bulletins, books, periodicals, newsletters, articles,
25 brochures, advertisements, reports, logs, agenda, minutes, studies, charts, graphs, maps,
26 drawings, schedules, plans, blueprints, sketches, schematics, models, surveys, printouts,
27 cards, diaries, calendars, desk calendars, appointment books, photographs, slides, films,
28 notes, drafts, worksheets, transcripts, recordings (mechanical, electrical, typed or written)

1 or any instrument or device which contains any information or from which any
2 information can be derived or retrieved.

3
4 **INSTRUCTIONS**

5 The following instructions are to be considered applicable to all demands for production
6 of documents and things contained herein:

- 7
- 8 1. In producing these documents, you are required to furnish all documents known or
9 available to you regardless of whether these documents are possessed directly by you or
10 your agents, employees, representatives, investigators, or by your attorneys or their
11 agents, employees, representatives or investigators.
 - 12 2. If any of these documents cannot be produced in full, produce to the extent possible,
13 specifying your reasons for your inability to produce the remainder and stating whatever
14 information, knowledge, or belief you do have concerning the unproduced portion.
 - 15 3. If any documents or things requested were at one time in existence, but are no longer in
16 existence, please so state, specifying for each document or thing:
 - 17 a. The type of information contained thereon,
 - 18 b. The type of document or thing,
 - 19 c. The date upon which it ceased to exist,
 - 20 d. The circumstances under which it ceased to exist,
 - 21 e. The identity of all persons having knowledge of the circumstances under
22 which it ceased to exist, and
 - 23 f. The identity of all persons having knowledge of the contents thereof.
 - 24 4. If you refuse to produce any document on grounds of privilege, work product, or other
25 reasons, please identify each document not produced by author, recipient, date, and
26 general subject matter.
 - 27 5. The requests are continuing. If, after producing documents, you obtain or become aware
28 of any further documents responsive to this request, you are required to produce to

1 Plaintiff such additional documents.

2
3 **REQUESTS**

- 4 1. Please provide copies of all DOCUMENTS provided to you which is RELEVANT to the
5 SUBJECT LAWSUIT.
- 6 2. Please provide copies of all STATEMENTS made by any person to YOU, YOUR agents
7 or attorneys related to the INCIDENT.
- 8 3. Please provide the insurance policy relating to the SUBJECT LAWSUIT.
- 9 4. Please provide copies of statements made by YOU to anyone relating to the SUBJECT
10 LAWSUIT other than your attorneys.
- 11 5. Please provide copies of any photographs or video tapes prepared at YOUR request or on
12 YOUR behalf which are in any manner related to the SUBJECT LAWSUIT.
- 13 6. Please provide copies of any photographs or video tapes prepared which are in any
14 manner related to the SUBJECT LAWSUIT.
- 15 7. Please provide copies of any reports prepared at YOUR request or at the request of
16 anyone acting on YOUR behalf related to the SUBJECT LAWSUIT.
- 17 8. Please provide copies of all DOCUMENTS which you rely on in answering Plaintiff's
18 First Set of Interrogatories.

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20 DATED: 12 / 01 / 2005.

TORRES BROTHERS & FLORES, LLC.

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23 VICTORINO DLG. TORRES
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